



1 The grounds for this Motion are that the Complaint fails to state a claim upon  
2 which relief can be granted. Specifically, the Complaint does not contain facts  
3 sufficient to meet the pleading standards articulated by the Supreme Court in *Bell*  
4 *Atlantic Corp. v. Twombly*, 127 S.Ct. 1955 (2007) (“*Twombly*”) and *Ashcroft v. Iqbal*,  
5 129 S.Ct. 1937 (2009) (“*Iqbal*”).

6 This Motion is based on this Notice, the attached Memorandum of Points and  
7 Authorities, the Proposed Order filed and served concurrently herewith, all papers  
8 and pleadings on file, and on such further oral and documentary evidence that may  
9 be offered at the Motion hearing.

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11 DATED: January 26, 2016

CARLSON & MESSER LLP

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13 By: /s/ Jeanne L. Zimmer

14 Jeanne L. Zimmer

15 J. Grace Felipe

16 Attorneys for Defendants,

17 KEITH BAKER and LIEN

18 ENFORCEMENT, INC.  
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